

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
VICTORIA DIVISION**

In re:	)	Case No. 22-60020
	)	
INFOW, LLC, <i>et al.</i> ,	)	Chapter 11 (Subchapter V)
	)	
Debtors. <sup>1</sup>	)	Jointly Administered
	)	

**DEBTORS' MOTION TO EXTEND TIME  
TO FILE STATEMENT OF FINANCIAL AFFAIRS**

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

InfoW, LLC (“InfoW”), IWHealth, LLC (“IW Health”), and Prison Planet TV, LLC (“Prison Planet TV” and together with InfoW and IW Health, the “Debtors”), the debtors and debtors-in-possession in the above-captioned chapter 11 cases, hereby requests that this Court enter an order pursuant to Rules 1007(c) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) extending the time by which the Debtors must file their Statements of Financial Affairs by an additional seven (7) days to, and including, May 9, 2022. In support of this Motion, the Debtors respectfully state as follows:

---

<sup>1</sup> The Debtors in these chapter 11 cases along with the last four digits of each Debtor’s federal tax identification number are as follows: InfoW, LLC, f/k/a Infowars, LLC (6916), IWHealth, LLC f/k/a Infowars Health, LLC (no EIN), Prison Planet TV, LLC (0005). The address for service to the Debtors is PO Box 1819, Houston, TX 77251-1819.

### **Jurisdiction**

1. This Court has jurisdiction to consider this Motion pursuant to 28 U.S.C. § 1334. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A), (M) and (O). Venue is proper before this Court under 28 U.S.C. §§ 1408 and 1409.

2. The basis for the relief sought herein are Bankruptcy Rule 1007(c).

### **Background**

3. On April 18, 2022 (the “Petition Date”), each of the Debtors commenced a case by filing a petition for relief under chapter 11, subchapter v, of the Bankruptcy Code (collectively, the “Chapter 11 Cases”).

4. The Debtors continue to operate their businesses and manage their properties as debtors and debtors-in-possession pursuant to Bankruptcy Code §§ 1107(a) and 1108.

5. As of the filing of this Motion, no creditors’ committee has been appointed in the Chapter 11 Cases by the Office of the United States Trustee for Region 7 (the “U.S. Trustee”).

6. The Debtors’ meeting of creditors under Bankruptcy Code § 341 is set for May 26, 2022.

### **Relief Requested**

7. By this Motion, the Debtors seek entry of an order extending the time within which it must file their Statement of Financial Affairs from the current deadline to, and including, May 9, 2022.

### **Basis for Relief**

8. Bankruptcy Rule 1007(c) provides for extension of the deadline for a debtor to file its schedules and statements “on motion for cause shown and on notice to the United States trustee,

any committee elected under §705 or appointed under §1102 of the Code, trustee, examiner, or other party as the court may direct.”

9. The Debtors filed their Schedules on the date of this Motion. Additionally, the Debtors believe that they have filed or submitted all of the documents required by Bankruptcy Rule 1007(c) other than their respective Statements of Financial Affairs.

10. The Debtors’ have largely completed their Statements of Financial Affairs. Due to the contentious nature of the Chapter 11 Cases, however, the Debtors’ chief restructuring officer and professionals believe that certain aspects of the Statement of Financial Affairs require additional investigation and confirmation prior to filing. While normally the Debtors’ estates might be better served by filing the Statement of Financial Affairs using the best information available and amending based on further investigation, the Debtors estates and their creditors will be better served here by extending the time for filing. The additional seven (7) days—to May 9, 2022— will provide sufficient time for the Debtors to finalize the Statements of Financial Affairs while allowing adequate time before the section 341 meeting and the hearings on the pending motions for parties-in-interest to review.

*[Remainder of Page Intentionally Left Blank]*

WHEREFORE, the Debtors respectfully request that the Court enter an order granting the relief requested herein, and such other and further relief as is deemed proper.

Dated: May 2, 2022

**PARKINS LEE & RUBIO LLP**

/s/ R.J. Shannon

Kyung S. Lee

TX Bar No. 12128400

R.J. Shannon

TX Bar No. 24108062

Pennzoil Place

700 Milam Street, Suite 1300

Houston, TX 77002

Email: klee@parkinslee.com

rshannon@parkinslee.com

Phone: 713-715-1660

Fax: 713-715-1699

*Proposed Counsel to the Debtors and  
Debtors-in-Possession*

**CERTIFICATE OF SERVICE**

I hereby certify, a true and correct copy of the foregoing document was served (a) by the Court's CM/ECF system on all parties registered to receive such service and (b) on the following parties by email:

Kaster Lynch Farrar & Ball, LLP  
Attn: Mark Bankson, William Ogden  
1117 Herkimer Street  
Houston, TX 77008  
[mark@fbtrial.com](mailto:mark@fbtrial.com)  
[bill@fbtrial.com](mailto:bill@fbtrial.com)

Koskoff Koskoff & Bieder  
Attn: Alinor C. Sterlin, Christopher Mattei,  
Matthew Blumenthal  
350 Fairfield Avenue  
Bridgeport, CT 06604  
[asterling@koskoff.com](mailto:asterling@koskoff.com)  
[cmattei@koskoff.com](mailto:cmattei@koskoff.com)  
[mblumenthal@koskoff.com](mailto:mblumenthal@koskoff.com)

Fertitta & Reynal LLP  
Attn: F. Andino Reynal  
917 Franklin St., Suite 600  
Houston, TX 77002  
[areynal@frlaw.us](mailto:areynal@frlaw.us)

Pattis & Smith, LLC  
Attn: Norman A Pattis, Cameron L.  
Atkinson  
383 Orange Street  
New Haven, CT 06511  
[npattis@pattisandsmith.com](mailto:npattis@pattisandsmith.com)  
[catkinson@pattisandsmith.com](mailto:catkinson@pattisandsmith.com)

Zeisler & Zeisler P.C.  
Attn: Eric Henzy  
10 Middle Street, 15th Floor  
Bridgeport, CT 06604  
[ehenzy@zeislaw.com](mailto:ehenzy@zeislaw.com)

Jordan & Ortiz, P.C.  
Attn: Shelby Jordan  
500 N. Shoreline Blvd. Suite 900  
Corpus Christi, Texas 78401  
[sjordan@jhwclaw.com](mailto:sjordan@jhwclaw.com)

Law Office of Ray Battaglia, PLLC  
Attn: Ray Battaglia  
66 Granburg Circle  
San Antonio, TX  
[rbattagliaw@outlook.com](mailto:rbattagliaw@outlook.com)

McDowell Heterhington LLP  
Attn: Avi Moshenberg, Nick Lawson,  
Matthew Caldwell  
1001 Fannin Street, Suite 2700  
Houston, TX 77002  
[avi.moshenberg@mhllp.com](mailto:avi.moshenberg@mhllp.com)  
[nick.lawson@mhllp.com](mailto:nick.lawson@mhllp.com)  
[matthew.caldwell@mhllp.com](mailto:matthew.caldwell@mhllp.com)

The Akers Law Firm PLLC  
Attn: Cordt Akers  
3401 Allen Parkway, Suite 101  
Houston, TX 77019  
[cca@akersfirm.com](mailto:cca@akersfirm.com)

Copycat Legal PLLC  
Attn: Daniel DeSouza  
3111 N. University Drive, Suite 301  
Coral Springs, FL 33065  
[dan@copycatlegal.com](mailto:dan@copycatlegal.com)

Richard S. Schmidt  
615 Leopard, #635  
Corpus Christi, TX 78401  
[rss@judgerss.com](mailto:rss@judgerss.com)

Russell F. Nelms  
115 Kay Lane  
Westworth Village, TX 76114  
[rfargar@yahoo.com](mailto:rfargar@yahoo.com)

Attn: W. Marc Schwartz  
Schwartz Associates  
712 Main Street, Ste. 1830  
Houston, TX 77002  
[MSchwartz@schwartzassociates.us](mailto:MSchwartz@schwartzassociates.us)

Matthew Okin  
Okin Adams LLP  
1113 Vine St., Ste. 240  
Houston, TX 77002  
[mokin@okinadams.com](mailto:mokin@okinadams.com)

Office of the United States Trustee  
Attn: Ha Minh Nguyen, Jayson Ruff  
515 Rusk St  
Ste 3516  
Houston, TX 77002  
[ha.nguyen@usdoj.gov](mailto:ha.nguyen@usdoj.gov)  
[jayson.b.ruff@usdoj.gov](mailto:jayson.b.ruff@usdoj.gov)

Melissa Haselden  
700 Milam, Suite 1300  
Houston, TX 77002  
[mhaselden@haseldenfarrow.com](mailto:mhaselden@haseldenfarrow.com)

Cain & Skarnulis, PLLC  
Attn: Ryan E. Chapple  
303 Colorado St., Ste. 2850  
Austin, TX 78701  
[rchapple@cstrial.com](mailto:rchapple@cstrial.com)

Byman & Associates PLLC  
Randy W. Williams  
7924 Broadway, Suite 104  
Pearland, TX 77581  
[rww@bymanlaw.com](mailto:rww@bymanlaw.com)

J. Maxwell Beatty  
The Beatty Law Firm PC  
1127 Eldridge Pkwy, Ste. 300, #383  
Houston, TX 77077  
[max@beattypc.com](mailto:max@beattypc.com)

Walston Bowlin Callendar, PLLC  
Attn: Cliff Walston  
San Felipe Street, Suite 300  
Houston, TX 77027  
[cliff@wbctrial.com](mailto:cliff@wbctrial.com)

/s/ R. J. Shannon  
R. J. Shannon